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U.S. EPA ATTN: Harbor Comments 805 SW Broadway, Suite 500 Portland, OR 97205

EPA-REGION 10

The Environmental Protection Agency has developed a plan to clean a ten-mile stretch of the Willamette River by dredging 167 acres of sediment and moving 1.9 million cubic yards of sediment contaminated with hazardous substances to a landfill. This plan is estimated to cost at least \$746 million dollars, but it could cost much more than believed. Further, the plan could actually do more harm than good for the Willamette River's environment. It's a big waste of money to do something this invasive to the river and disturb the habitat and its conditions. The EPA has a vested interest interest in doing things that promote their own point of view opposed to those who are looking to clean up the river in a meaningful way. We need to look into cleaning up the river in a way that won't hurt the environment even more.

The EPA's plan is based primarily on studies that were conducted in 2004. That data is now twelve years old and doesn't reflect the present reality of the river. Scientific experts found in 2014 that the natural processes have actually reduced the river's pollution by 40% — and that's a conservative estimate. However, the EPA has chosen to ignore this new data and focus on an aggressive dredging plan. There is a possibility that the natural solution — as well as a few less costly and invasive procedures — might accomplish a cleanup of the river without causing additional problems, but dredging could reverse all of this natural progress and leave the river in worse shape than before. The United States Army Corps of Engineers are experts in projects like this, and they have always recommended starting with the least aggressive methods available. In this situation, I would trust their opinion over the EPA's. Further, the EPA's water quality goal for the Willamette is that a person could eat fish from the river as their main source of food for twenty years without any ill effects. This might be a good goal, but it is an extremely unrealistic one for an urban river. Not only that, but such a diet would far exceed what another branch of the government, the FDA, safely recommends. The standard that the EPA has set is impossible to reach.

While I am now retired, I have worked in delivering fuel oil and in the trucking business. These are areas where the EPA is often involved, and my experiences make me distrust the EPA's solution for the Willamette River. I have seen how the EPA works firsthand and I haven't seen them handle anything in a cost effective, less invasive manner. They always do things that cost more, that propagates their position and doesn't actually solve the problem. In fact, they seem to invent more problems. Their current plan is an example of this as it is a wasteful and invasive plan that would invent more problems than it solves.

I have lived in Portland since 1978, and I know that this is a plan that does not meet the needs of the people here. We need to look for a better solution that would be more cost effective and less harmful to the community.

Sincerely

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